

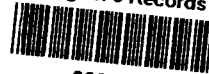
1630450034



**PFIZER PIGMENTS INC.**

A subsidiary of Pfizer Inc.  
2001 Lynch Avenue, East St. Louis, Ill. 62205

EPA Region 5 Records Ctr.



390910

*please file*

*1630450034 - St Clair Co  
Pfizer  
RCRA Permit*

June 3, 1988

Mr. Lawrence Eastep, P.E.  
Manager, Permit Section  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Eastep:

This letter is in response to your May 6, 1988 letter requesting that this facility file a Part B application as a hazardous waste treatment/storage/disposal site.

As indicated in your letters of October 23, 1987 and March 22, 1988 (attached), Pfizer is no longer a hazardous waste treatment site. This operation, which uses spent pickle liquor (K062) as a substitute for virgin acid, is excluded from the RCRA regulations concerning T/S/D sites since the spent pickle liquor is not classified as either a hazardous or a solid waste. As your March 22 letter states, our Part A permit application has been withdrawn; thus, there is no need for a Part B application.

While our plant did retain our I.D. number (IL006317119) to be used as a generator's number, we do not generate hazardous waste on a regular basis, nor do we intend to store hazardous waste for a period of 90 days or more. Therefore, there is no need to file a Part B for a storage site.

If you should have any questions regarding this matter, please contact Jeff Carlton or me.

Sincerely,

Roger E. Rader  
Plant Manager

Attachments

rm

RECEIVED

JUN 6 1988

IEPA-DLPC



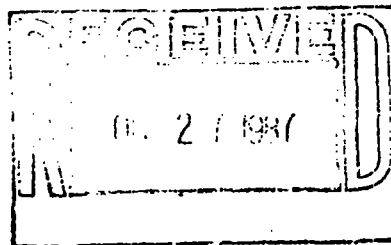
Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1630450034 - St. Clair County  
Pfizer Pigments, Inc.  
ILD006307119  
RCRA - General

October 23, 1987

Mr. Roger E. Rader  
Plant Manager  
Pfizer Pigments, Inc.  
2001 Lynch Avenue  
East St. Louis, IL 62205



Dear Mr. Rader:

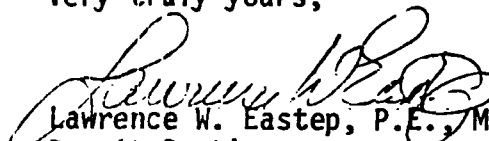
This letter is to clarify the Agency's August 27, 1987 letter regarding the regulatory status of spent pickle liquor from steel operations which is used to produce iron oxide products at Pfizer Pigments, Inc.

Based on the description provided in your letter, it is the Agency's opinion that the spent pickle liquor is used as an effective substitute for a commercial product. Therefore, pursuant to 35 Ill. Adm. Code 721.102(e)(1)(B) it is not classified as a solid waste nor as a hazardous waste under RCRA when it is recycled in this manner. Furthermore, because it is not a solid waste it is excluded from regulation under 35 Ill. Adm. Code 702, 703, 705 and 722 through 726.

The Agency also recommends that Pfizer Pigments withdraw the Part A dated November 13, 1980 in order to correct the regulatory status of the facility.

If you have any questions regarding this matter, please feel free to call Rob Watson at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WRW:bjh/3976g/73

CC: Southern Region  
Division File  
Harry Chappel  
Gary King



217/782-6762

Refer to: 1630450034 -- St. Clair County  
East St. Louis/Pfitzer  
ILD006317119 -- Part A Log 183

March 22, 1988

Pfitzer, Inc.  
Attn.: Jeffrey C. Carlton, P.E.  
2001 Lynch Ave.  
East St. Louis, IL 62205

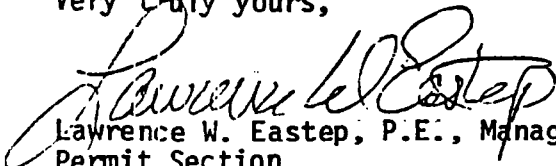
Dear Mr. Carlton:

This is in response to your request to withdraw the Part A Application for the subject facility. An Agency review of records on February 8, 1988 confirms that this facility should be reclassified as a generator only status and the Part A withdrawn.

Your I.D. number (ILD006317119) will be retained in case this facility generates, stores, treats or disposes of regulated quantities of hazardous waste in the future.

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at (217) 782-5504.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:EWD:ct/797j,35

cc: Southern Region  
Compliance Monitoring  
Division File - RCRA Part A  
USEPA - Jim Mayka  
USEPA - Mary Murphy  
USEPA - Art Kawatachi